

SEYFARTH SHAW LLP
Giovanna A. Ferrari (Pro Hac Vice)
Caitlyn M. Crisp (Pro Hac Vice)
2029 Century Park East, Suite 3500
Los Angeles, California 90067-3021
Telephone: (310) 277-7200
Facsimile: (310) 201-5219
gferrari@seyfarth.com
ccrisp@seyfarth.com

KAMER ZUCKER ABBOTT
Kaitlin H. Paxton (#13625)
3000 West Charleston Boulevard, Suite 3
Las Vegas, Nevada 89102-1990
Telephone: (702) 259-8640
Facsimile: (702) 259-8646
kpaxton@kzalaw.com

Attorneys for Defendant
GET FRESH SALES, INC.

JEFFREY GRONICH, ATTORNEY AT LAW, P.C.
Jeffrey Gronich (#13136)
1810 E. Sahara Ave., Suite 109
Las Vegas, Nevada 89104
Tel: (702) 430-6896
Fax: (702) 727-3903
jgronich@gronichlaw.com

Attorney for Plaintiff
ZACHARY LASKO

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ZACHARY LASKO, an individual,

Plaintiff,

v.

GET FRESH SALES, INC;
EMPLOYEE(S)/AGENT(S) DOES 1-10; and
ROE CORPORATIONS 11-20, inclusive,

Defendants.

Case No. 2:22-cv-01176-JAD-BNW

**STIPULATION AND REQUEST FOR
STAY OF DISCOVERY OF THIRTY-ONE
(31) DAYS**

First Request

A. Facts Relevant to Stay Requested

1. Plaintiff filed the Complaint on June 12, 2022.

2. Defendant removed the case to federal court on July 21, 2022

3. Defendant answered the Complaint on July 28, 2022.

4. On September 9, 2022, the parties are due to file the proposed Discovery Plan and Scheduling Order.

5. Plaintiff and Defendant would like to devote their resources to an early resolution of this case and want to minimize to the extent possible the expenditure of monies for attorneys' fees.

6. Before engaging in formal discovery, the parties have agreed to engage in informal discovery, which will allow the Parties to value the case appropriately.

7. Following the informal productions, the parties intend to discuss possible resolution of this case.

8. The parties agree that the documents requested by Plaintiff and Defendant for the informal discovery will be produced by close of business on **September 2, 2022**.

9. In order to have time to perform the above without engaging in the expense of formal discovery, the parties agree a stay of discovery is in order.

10. This Stipulation is made for the purposes stated above and not for purposes of delay or any other improper purpose.

B. Stay of Discovery.

1. The parties agree to stay discovery in this matter for thirty-one days from September 2, 2022, which is until **October 3, 2022**.

2. Defendant will produce Plaintiff's personnel file by September 2, 2022.

3. Plaintiff will produce documents and information regarding his subsequent employment following his termination of employment by Defendant, including his efforts to obtain subsequent employment and his earnings to date by September 2, 2022.

///

///

///

4. If the parties do not have an agreement to settle by September 27, 2022, the parties will file a Discovery Plan and Scheduling Order no later than October 4, 2022.

DATED: August 25, 2022

By: /s/ Caitlyn M. Crisp

SEYFARTH SHAW LLP
Giovanna A. Ferrari (Pro Hac Vice)
Caitlyn M. Crisp (Pro Hac Vice)
2029 Century Park East, Suite 3500
Los Angeles, California 90067-3021
Telephone: (310) 277-7200
Facsimile: (310) 201-5219
gferrari@seyfarth.com
ccrisp@seyfarth.com

Kaitlin H. Paxton (#13625)
KAMER ZUCKER ABBOTT
3000 West Charleston Boulevard, Suite 3
Las Vegas, Nevada 89102-1990
Tel: (702) 259-8640
Fax: (702) 259-8646
kpaxton@kzalaw.com

Attorneys for Defendant
GET FRESH SALES, INC.

DATED: August 25, 2022

By: /s/ Jeffrey Gronich

JEFFREY GRONICH, ATTORNEY AT
LAW, PC.
Jeffrey Gronich (#13136)
1810 E. Sahara Ave., Suite 109
Las Vegas, Nevada 89104
Tel: (702) 430-6896
Fax: (702) 727-3903
jgronich@gronichlaw.com

Attorney for Plaintiff
ZACHARY LASKO

ORDER

For the reasons stated above, and for good cause, it is hereby ordered as follows:

1. Defendant will produce Plaintiff's personnel file by **September 2, 2022**.

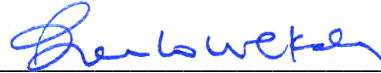
2. Plaintiff will produce documents and information regarding his subsequent employment following his termination of employment by Defendant, including his efforts to obtain subsequent employment and his earnings to date by close of business on **September 2, 2022**.

3. The parties agree to stay discovery in this matter for thirty-one days from September 2, 2022, which is until **October 3, 2022**.

4. The parties will file a proposed Discovery Plan and Scheduling Order by 10/4/2022.

IT IS SO ORDERED.

DATE: August 29, 2022.



The Hon. Brenda Weksler
United States Magistrate Judge